

## **EXHIBIT A**

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**From:** Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]  
**Sent:** Monday, June 26, 2017 6:19 PM  
**To:** Vanderwal, Amy E.  
**Cc:** Brown, Seanna R.; Hoang, Lan; Woltering, Catherine E.  
**Subject:** RE: PW - deposition of Robert Blecker

I offered that and, as the transcript reflects, Judge Bernstein did not ask me to get a doctor's letter. If he had wanted me to get one, he would have ordered it.

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
Fax: (888) 759-1114

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**From:** Vanderwal, Amy E. [<mailto:avanderwal@bakerlaw.com>]  
**Sent:** Monday, June 26, 2017 3:45 PM  
**To:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Cc:** Brown, Seanna R. <[sbrown@bakerlaw.com](mailto:sbrown@bakerlaw.com)>; Hoang, Lan <[lhoang@bakerlaw.com](mailto:lhoang@bakerlaw.com)>; Woltering, Catherine E. <[cwoltering@bakerlaw.com](mailto:cwoltering@bakerlaw.com)>  
**Subject:** RE: PW - deposition of Robert Blecker

Helen – the relevant portion of the hearing transcript was referenced in my May 24<sup>th</sup> letter. As you will see from the letter, you represented to the court that you could get a doctor's letter in response to Judge Bernstein's concern that he had no way to know if Mr. Blecker was competent to testify. Has something changed since the time of your representation that prevents you from obtaining such a letter?

Regards,  
Amy

**Amy Vanderwal**

Partner

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**BakerHostetler**

45 Rockefeller Plaza  
New York, NY 10111-0100  
T +1.212.589.4612

[avanderwal@bakerlaw.com](mailto:avanderwal@bakerlaw.com)  
[bakerlaw.com](http://bakerlaw.com)



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**From:** Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]  
**Sent:** Friday, June 23, 2017 6:16 AM  
**To:** Vanderwal, Amy E.  
**Cc:** Brown, Seanna R.; Hoang, Lan; Woltering, Catherine E.  
**Subject:** RE: PW - deposition of Robert Blecker

Amy: Can you send me the portion of the transcript where Judge Bernstein required me to produce a physician's affidavit with respect to Mr. Blecker? I have not been able to locate it.

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
Cell: (908) 303-4568  
Fax: (888) 759-1114

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**From:** Vanderwal, Amy E. [<mailto:avanderwal@bakerlaw.com>]  
**Sent:** Thursday, June 22, 2017 5:00 PM  
**To:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Cc:** Brown, Seanna R. <[sbrown@bakerlaw.com](mailto:sbrown@bakerlaw.com)>; Hoang, Lan <[lhoang@bakerlaw.com](mailto:lhoang@bakerlaw.com)>; Woltering, Catherine E. <[cwoltering@bakerlaw.com](mailto:cwoltering@bakerlaw.com)>  
**Subject:** PW - deposition of Robert Blecker

Dear Helen,

I write in connection with my May 24, 2017 letter (the "Trustee's Letter") responding to your May 8, 2017 email indicating that Robert Blecker has information relevant to his father, Aaron Blecker's, BLMIS account and raising the possibility of taking Robert Blecker's deposition. The Trustee's Letter explained that we could not schedule Robert Blecker's deposition until we had received:

(1) a physician's affidavit detailing Aaron Blecker's unavailability to testify at the omnibus evidentiary hearing based on health or age—which you offered to provide to the Court during the April 18, 2017 hearing on the Motions *in Limine*; and

(2) a proffer detailing Robert Blecker's proposed testimony and the basis for his personal knowledge.

It has been four weeks and we have received no response from you. The Trustee's position remains the same as laid out in his Letter and we would like to resolve this issue as soon as possible. To that end, we ask for your response in the next ten days.

Regards,  
Amy

**Amy Vanderwal**  
Partner

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**BakerHostetler**

45 Rockefeller Plaza  
New York, NY 10111-0100  
T +1.212.589.4612

[avanderwal@bakerlaw.com](mailto:avanderwal@bakerlaw.com)  
[bakerlaw.com](http://bakerlaw.com)



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